

August 14, 2018

The Honorable Theodore Chuang
U.S. District Court
for the District of Maryland
101 W. Lombard Street
Baltimore, Maryland 21202

Re: *The National Federation of the Blind, et al. v.*
U.S. Department of Education, et al.
Civil Action No.: 1:18-cv-01568-TDC

Notice regarding filing of Motion for Preliminary Injunction

Dear Judge Chuang:

Pursuant to your Case Management Order of May 31, 2018, we write to request a pre-motion conference with the Court. We request permission to file a Motion for Preliminary Injunction to enjoin Defendants from continuing to use the amended versions of the rules cited in the Complaint. Specifically, in our Motion we will ask that the Court require Defendants to use the versions of the Rules from the 2015 Case Processing Manual rather than the 2018 version. Plaintiffs are prepared to satisfy the four-prong test articulated by this court to demonstrate that a preliminary injunction is appropriate, including demonstrating irreparable harm from continuing to allow Defendants to use the new rules.

We look forward to speaking with you about the filing of this Motion.

Sincerely,



Eve L. Hill
Brooke E. Lierman
Brown, Goldstein & Levy, LLP
120 East Baltimore Street, Suite 1700
Baltimore, MD 21202
T: (410) 962-1030
F: (410) 385-0869
ehill@browngold.com
blierman@browngold.com

ELH:jh